

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

**RETURN DATE: 10/4/2023**  
**TIME: 11:00 a.m.**

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In re:

80 WEST WASHINGTON PLACE REAL ESTATE  
HOLDINGS, LLC,

CASE NO: 23-11347-JPM  
CHAPTER 11

Debtor.

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**NOTICE OF MOTION FOR ORDER  
MODIFYING AND TERMINATING AUTOMATIC STAY**

**PLEASE TAKE NOTICE**, that upon the Application dated September 7, 2023 ("Application"), Emigrant Bank ("Applicant"), a secured creditor of the above-named debtor, by its attorneys, Terenzi & Confusione, P.C., shall move for an Order: (i) pursuant to 11 U.S.C. Section 362(d), providing that the automatic stay imposed by operation of 11 U.S.C. Section 362(a), be modified and terminated to permit Applicant to pursue its rights as more particularly described in the Application, to the property known as 80 West Washington Place, New York, New York, and (ii) granting such other and further relief as is just and proper.

**PLEASE TAKE FURTHER NOTICE** that this motion shall be returnable on the 4<sup>th</sup> day of October, 2023 at 11:00 a.m. of that day, or as soon thereafter as counsel can be heard **via Zoom**, before the Hon. John P. Mastrando III.

**PLEASE TAKE FURTHER NOTICE** that attorneys and self-represented individuals are required to sign up to appear at court hearings with the Court's eCourt Appearances tool at <https://ecf.nysb.uscourts.gov/cgi-bin/nysbAppearances.pl>. Case participants must check in to confirm their appearance no later than 4:00 pm, one business day prior to the scheduled hearing date. If you require assistance, please contact the presiding Judge's Chambers.

**PURSUANT TO BANKRUPTCY RULE 9014 AND LOCAL BANKRUPTCY RULE**



**9006-1(b), IF YOU INTEND TO OPPOSE THE MOTION, YOU MUST SERVE ON  
MOVANT'S COUNSEL AND FILE WITH THE CLERK OF THE BANKRUPTCY COURT,  
WRITTEN OPPOSITION TO THE MOTION SO AS TO ENSURE ACTUAL RECEIPT  
NOT LATER THAN (7) DAYS BEFORE THE RETURN DATE.**

Dated: Garden City, New York  
September 7, 2023

**TERENZI & CONFUSIONE, P.C.**  
Attorneys for EMIGRANT BANK

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TO: 80 West Washington Place Real Estate Holdings, LLC  
Chapter 11 Debtor  
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